

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America)

v.)

WESLEY E. TRAFFORD)

Case No.)

3:20-mj- 54)

Defendant(s)

FILED
 JUN 30 2020
 U.S. CLERK'S OFFICE
 EVANSVILLE, INDIANA
 -MPB/A

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

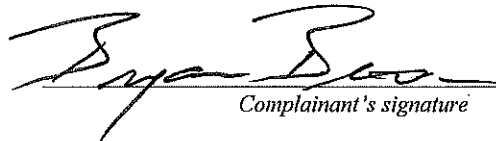
On or about the date(s) of February 17 and 24, 2018 in the county of Vanderburgh in the
Southern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2251(a)	Production and Attempted Production of Sexually Explicit Material Involving Minors
Title 18, United States Code, Section 2252(a)(2)	Distribution of Sexually Explicit Material Involving Minors

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.


 Complainant's signature

Bryan Brown, Task Force Officer, FBI

Printed name and title

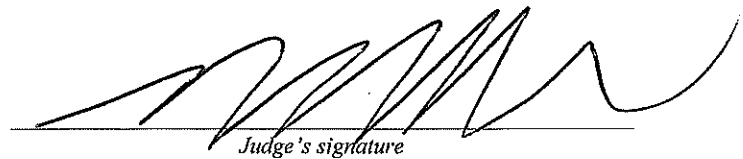
Sworn to before me and signed in my presence.

Date:

06/30/20

City and state:

Evansville, Indiana


 Judge's signature

Matthew P. Brookman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND
ARREST WARRANT FOR **WESLEY E. TRAFFORD**

INTRODUCTION

Your Affiant, Task Force Officer (TFO) Bryan Brown, being duly sworn, deposes and says:

1. I am a detective with the Evansville Police Department (“EPD”) assigned to the FBI’s Child Exploitation Task Force. I have been deputized as a Federal Agent through the United States Marshals Service and have been employed by the EPD for 20 years. The following facts are either known to me personally or were given to me by persons identified in the paragraphs below.

2. This affidavit is submitted in support of a request for the issuance of a criminal complaint and arrest warrant for Wesley E. Trafford, for the offenses of production of sexually explicit material involving minors in violation of Title 18, United States Code, Section 2251(a) and distribution of sexually explicit material involving minors in violation of Title 18, United States Code, Section 2252(a)(2). Since this affidavit is being submitted for the limited purpose of securing an arrest warrant and complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the proposed arrest warrant and complaint.

ALLEGED OFFENSES

3. This investigation concerns the production of sexually explicit material involving minors, in violation of Title 18, United States Code, Section 2251(a) and the distribution of sexually explicit material involving minors in violation of Title 18, United States Code, Section 2252(a)(2). These statutes prohibit the production and distribution of visual depictions of minors engaging in sexually explicit conduct under circumstances involving some form of interstate nexus including transmission over the internet and production using materials that have been transported in interstate commerce. "Sexually explicit conduct" means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any persons. *See* 18 U.S.C. § 2256(2).

RESULTS OF INVESTIGATION

4. On January 17, 2018, person MD contacted the Evansville Police Department to report that she had been contacted by an individual and advised someone was using her name and photographs on several social media accounts to talk to underage girls.

5. On February 22, 2018, Evansville Police Department Detective Brian Turpin and I met with MD at the Newburgh Police Department. MD stated she had received a message through Facebook from an unknown female asking if MD only had one Facebook account. MD told the unknown female that she only had one Facebook account. The unknown female told MD that she had received messages from MD in the past from a different Facebook account that used MD's name. MD said the unknown female then sent her screenshots of messages sent from an Instagram account that MD did not know about. The messages were purportedly from MD

and were calling the other female beautiful and other things. The person using MD's name and pictures gave their phone number to the unknown female reporting this information to MD. MD then began researching the phone number to determine who it was that had created these accounts using her identity and pictures. MD said she was able to trace the phone number and found out its service was through Metro PCS and it came back to a user who is Wesley E. Trafford's mother.

6. At that time, MD was still not sure who was responsible for creating the accounts and pretending to be her. MD sent a text message to the phone number and essentially told the person that they were under investigation. MD said she was trying to scare the person into telling her who they were. MD said she got a response and the individual she was texting with said they would take down all the accounts. MD said she told the individual to give her their name and all the accounts and passwords and she would let it go. MD said the individual told her his name and that it was Wesley Trafford. MD said she ran his name through Google and learned that he was a registered sex offender and realized she had to report the activity she had discovered.

7. MD was not sure why Trafford picked her but knew that her boyfriend was in jail with Trafford about three years ago and she thinks Trafford is familiar with her because of that connection.

8. MD said she had never talked with Trafford. MD said in November of 2017 she saw an unauthorized MeetMe in her name with her photo that got deleted. MD said in December she saw an unauthorized Facebook account using her name and photo that she had deleted. MD found another MeetMe account and an Instagram account of the same nature. MD said Trafford was even paying for some of the MeetMe services. MD said she was able to see what Trafford had listed as who he was looking for and the age limit was set for 14 years old to 17 years old.

MD said Trafford had deleted the conversations he had with individuals, but she could see who he had been in contact with and that none were over the age of 18 years old. MD said there were a couple of boys in the list, but it was mostly girls.

9. MD provided screenshots of her conversation with Trafford that occurred on January 16, 2018. The phone number she was texting with was 812-802-XXXX. In her communications with Trafford, MD stated she had contacted the police and was talking with an officer and Trafford could be charged with identity theft. MD received a response that said, "Don't please I'm sorry I'm deleting the account." MD asked who he was and told him that she knew the phone number he was using returned to a women she had identified. Trafford again repeated that he was sorry and that he was deleting the accounts. MD again asked him who he is and he said, "One more chance please my names Wesley ok I'm sorry I swear if u drop everything ull (sic) never hear from me again I'll never do this shit again." MD said she wanted him to contact her from a personal account, so she knew he was telling the truth. Trafford responded and said, "I don't have a personal account. I'm being honest I swear to u disabled the account u can have the login if u want it. As proof that I'm being serious." MD told him that "Wesley" wasn't good enough and that was his last chance to tell her. Trafford responded and said, "Wait. I'll tell u. My names Wesley trafford. Ok. I honestly have no account and I did delete urs. I deleted the account if u want the info for account u can have it to make sure it's deleted." MD confronted him about being a registered sex offender. Trafford said, "There is one Instagram account the Facebook account was closed. Down by Facebook for impersonations the only other one is the Instagram account that I disabled. But the login username is XXXX password XXXX. I swear to you. This won't happen again that's the only other account. It was a

mistake and I do apologize I know you don't care. But I really am sorry all I'm asking for is one last chance."

10. A check of the Vanderburgh County Sex Offender Registry list shows that Wesley Trafford is a registered sex offender and his listed address is on Maryland Street in Evansville, Indiana. Trafford has a September 26, 2014 Vanderburgh County Indiana conviction for child Exploitation. A check of the Evansville Police Department's data base shows records for Wesley E. Trafford and his listed home address is on Maryland Street in Evansville, Indiana. A check of the Evansville Police Department's data base shows records for Trafford's mother at the same address. The phone used by Trafford to communicate with MD is subscribed to by Trafford's mother.

11. On March 2, 2018, a search warrant was executed at the residence of Wesley E. Trafford. Trafford was home at the time. I explained to Trafford the reason for the search warrant and he agreed to be interviewed by Detective Brian Turpin at the Evansville Police Department. A few items of evidence were collected and submitted to Detective Sergeant David Price with the Indiana State Police for forensic analysis.

12. Trafford was transported to the Evansville Police Department by Detective Turpin and advised of his Miranda rights. Trafford indicated he understood his rights and waived those rights by signing a Miranda rights form presented to him by Detective Turpin. During the interview Trafford admitted to using the identity of MD to create social media accounts to communicate with girls.

13. While Trafford was being interviewed by Detective Turpin, I was searching his cell phone and discovered that he was using several social media accounts with a girl's name who is a minor female (hereafter "Minor Female A"). Trafford's cell phone is a black ZTE

model GSM Z981 ZMax Pro manufactured outside the United States. I found a lot of images on Trafford's cell phone that appear to be Minor Female A. I found completely nude images of Minor Female A. Some of the images were only of her genitalia. Minor Female A appeared to be under the age of 18 in the images I found. I contacted Detective Turpin with this information, he confronted Trafford with this information, and Trafford admitted to receiving the nude images from Minor Female A after he requested that she send them to him. Trafford admitted he believed Minor Female A was 16 or 17 years old at the time he asked for and received the nude images. The examination of Trafford's cellular phone indicated that Trafford received the images from Minor Female A on or about February 17, 2018. While examining Trafford's cell phone, I found evidence indicating that he was creating social media accounts using a male's information under the name "Skyler Wright."

14. Based on the details in some of her photos, I was able to find out where the Minor Female A lived and what school she was attending. On March 18, 2018, I interviewed Minor Female A at her school with her father's permission. Minor Female A reviewed the photos extracted from Trafford's cell phone I believed to be her. Minor Female A was able to identify herself in most of the images including images that showed her genitalia. Minor Female A said she had been talking with a boy by the name of "Skyler Wright" in the past when she took the nude images and sent them to him at his request. The images were taken by Minor Female A using her Samsung model Galaxy S5 cellular telephone that was manufactured outside the United States and transmitted to Trafford through internet connections. Minor Female A said she tried to talk on the phone with "Wright" and Skype with him, but he was never available or would not do it. I provided Minor Female A with information regarding several social media accounts that had her name in them and were being used on Trafford's cell phone. Minor Female

A denied that any of the accounts were hers and provided information regarding her actual social media accounts. It was clear that Trafford was using Minor Female A's name and her images in the same way he had used MD's images and information to pretend to be Minor Female A on the internet.

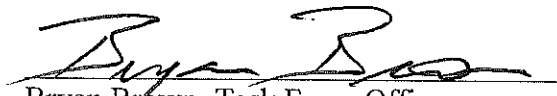
15. Detective Sergeant David Price conducted the forensic examination of the evidence taken from Trafford's home. During his examination he found evidence of Minor Female A's information and images being used with social media accounts. Price provided evidence of an e-mail address of "skylerrwright812" being used on the cell phone. Price also was able to provide information regarding a Kik account being used under Minor Female A's name. Price was able to provide evidence of a chat that occurred between the Kik account in Minor Female A's name and a Kik user with a username of ChappXXX. During the conversation Trafford, while pretending to be Minor Female A, states he wants to send nude images to ChappXXX. On February 24, 2018, Trafford proceeded to send 20 images to ChappXXX depicting Minor Female A; some of the images depicted Minor Female A's genitalia and while she is masturbating. These were the same images that were presented to Minor Female A during her interview. Minor Female A recognized the images, initialed them as verification, and stated she was 15 and 16 years old when the images were taken. Trafford admitted in his statement that he believed Minor Female A was 16 or 17 years old. Trafford apparently takes images from social media accounts belonging to other people to create fake accounts and uses the fake accounts to obtain nude images of minors and to distribute nude images of minors to others.

CONCLUSION

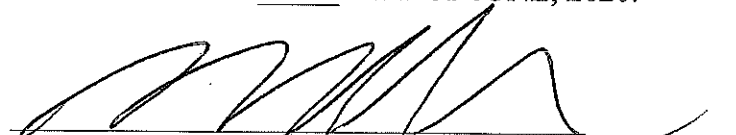
16. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that Wesley E. Trafford committed the offenses of production of sexually explicit material involving minors in violation of Title 18, United States Code, Section 2251(a) and distribution of sexually explicit material involving minors in violation of Title 18, United States Code, Section 2252(a)(2).

REQUEST FOR SEALING OF THIS AFFIDAVIT

17. It is further respectfully requested that this Court issue an Order sealing, until further order of this Court, all papers submitted in support of this complaint, affidavit, and arrest warrant. Sealing is necessary to protect the identity of minor victims and because release of the information in the complaint and affidavit may have a negative impact on this continuing investigation and may jeopardize its effectiveness.


Bryan Brown, Task Force Officer
Federal Bureau of Investigation

SWORN TO BEFORE ME THIS 30th DAY OF JUNE, 2020.


MATTHEW P. BROOKMAN, MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA